



Tiffany Joye  
Hogan Lovells US LLP  
One Tabor Center, Suite 1500  
1200 Seventeenth Street  
Denver, CO 80202  
T +1 303 454 2548  
F +1 303 899 7333  
www.hoganlovells.com

**VIA ELECTRONIC MAIL ([r5foia@epa.gov](mailto:r5foia@epa.gov))**

March 6, 2014

Regional Freedom of Information Officer  
U.S. EPA, Region 5 (MI-9J)  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

**RE: Freedom of Information Act Request**

Dear Sir/Madam:

I am writing to request, pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, copies of the following "records":

- (1) all records related to any proposed or actual investigations, reviews, audits, sampling, monitoring, or analytical results, that refer to, mention, discuss or relate to any of the following locations and any property located within 600 feet of any of the following locations: (a) the West Vermont Drinking Water Contamination Superfund Site, as identified on EPA's website, available at <http://www.epa.gov/region5/cleanup/cossellvermont/index.html>, (b) 3801-3823 West Michigan Street, Indianapolis, IN 46222 (known as the "Michigan Plaza" site), (c) 3800 West Michigan Street, Indianapolis, IN 46222 (known as "Michigan Meadows Apartments"), and (d) 700 North Olin Avenue, Indianapolis, IN 46222 (known as the "Genuine Parts" site);
- (2) all records regarding or related to the activities of Weston Solutions, Inc. and affiliated entities ("Weston") or Weston's contractors or subcontractors conducted on behalf of EPA at or with respect to any of the aforementioned locations;
- (3) all records establishing or relating to the relationship between EPA and Weston, and including any scope(s) of work, contracts, or proposals prepared by or between EPA and Weston; and
- (4) all records of communications with third parties, including the Indiana Department of Environmental Management and Marion County Health Department, regarding (a) the matters addressed by requests nos. 1, 2 or 3, above, or (b) the actual or potential liability of any person with respect to the West Vermont Drinking Water Contamination Superfund Site.

For the purpose of this request, "record" includes any writings, memoranda, notes, communications, minutes, logs, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, and all information maintained electronically (including computer databases and e-mail), on microfilm, on paper, and/or in other formats, including any and all drafts of any such records. Our request covers any record prepared on or after January 1, 2010.

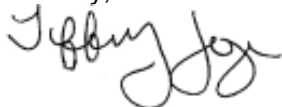
Should EPA withhold records covered by this request, please describe in detail each of those records and specify the statutory basis claimed for denial as well as any reasons for asserting that claim. See 40 C.F.R. § 2.104(h)(2)-(3).

We understand that we may incur certain charges as a result of this request, and we hereby agree to reimburse EPA for any such reasonable charges permitted under FOIA (e.g., for copying). If

the records are available electronically, we also would accept responses on CD or through other electronic media. If costs exceed \$250, please contact me directly at 303-454-2548 or [tiffany.joye@hoganlovells.com](mailto:tiffany.joye@hoganlovells.com) so that we may address the charges associated with this request.

If you have any other questions about my request, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tiffany Joye".

Tiffany Joye